



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 8

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NOV 30 2016

Ref: 8P-AR

Nancy Vehr, Administrator  
Air Quality Division  
Wyoming Department of Environmental Quality  
200 West 17<sup>th</sup> Street  
Cheyenne, Wyoming 82002

Re: Wyoming Department of Environmental Quality (WDEQ) 2007-2015 Exceptional Event  
Demonstration Packages

Dear Ms. Vehr:

This letter is a follow-up to the U.S. Environmental Protection Agency Region 8's May 2015 and April 2016 letters, WDEQ's May 2016 letter and several meetings earlier this year between WDEQ's Director, Todd Parfitt, and Region 8's Regional Administrator, Doug Benevento, regarding 75 potential exceptional event National Ambient Air Quality Standard (NAAQS) exceedances that are the subject of 45 exceptional event demonstration submittals from the WDEQ to EPA for concurrence (see Enclosure). WDEQ's 45 demonstrations were for PM<sub>10</sub>, PM<sub>2.5</sub> and ozone data that the state flagged as having been influenced by possible exceptional events for calendar years 2007-2015.

In 2007, EPA promulgated the "Treatment of Data Influenced by Exceptional Events; Final Rule" (72 Fed. Reg. 13560) creating a process for exclusion of air quality data related to exceedance of the NAAQS from regulatory decisions by the EPA.<sup>1</sup> From 2007 through 2015, the WDEQ flagged the 75 potential exceptional event exceedances in EPA's Air Quality System (AQS) database; provided weight-of-evidence demonstrations per 40 CFR 50.14 that these exceedances qualified as exceptional events; and requested EPA's concurrence.

The EPA understands that the WDEQ considers these potential exceptional event exceedances to be of regulatory significance because of the WDEQ's reliance on ambient data to determine compliance with the NAAQS, the use of ambient data in WDEQ's permitting process, and third-party interests. Therefore, the EPA analyzed whether the 75 flagged potential exceptional event exceedances would affect any pending EPA regulatory determinations.

The results of EPA's analysis is that we have not identified any pending EPA regulatory determinations that these 75 flagged potential exceptional event exceedances would affect. Therefore, the EPA is determining our review of the WDEQ 2007-2015 demonstration packages to be complete and does not intend to use any of the flagged data for any EPA regulatory determination or rulemaking activities to

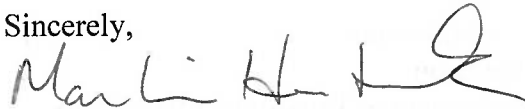
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<sup>1</sup> In 2016, EPA revised the Rule. "Treatment of Data Influenced by Exceptional Events; Final Rule" (81 Fed. Reg. 68216). EPA will address any exceptional event submittals under EPA's 2016 Rule in separate correspondence with WDEQ.

formulate or support regulation, guidance or any other pending EPA decision, position or action unless scientifically relevant and appropriate. The EPA will reevaluate the regulatory significance of these flagged potential event exceedances, recognizing WDEQ's submissions were made under the 2007 Exceptional Event Rule (72 Fed. Reg. 13560), if these become relevant to any future EPA regulatory determination or rulemaking activities to formulate or support regulation, guidance or any other pending EPA decision, position or action unless scientifically relevant and appropriate.

We are committed to continuing to work with the WDEQ on exceptional events within Wyoming. If you have questions, please feel free to contact Monica Morales, Air Program Director, at (303) 312-6936.

Sincerely,

A handwritten signature in black ink, appearing to read "Martin Hestmark". The signature is fluid and cursive, with a large, stylized "M" and "H".

Martin Hestmark  
Assistant Regional Administrator  
Office of Partnerships and Regulatory Assistance

Enclosure

# ENCLOSURE

EE Date	Year	Location	Monitor ID	Parameter	Monitored Value	Ref.
1/8/2007	2007	Black Butte	56-037-0868-2	PM <sub>10</sub>	199 µg/m <sup>3</sup>	1
3/27/2007	2007	Sheridan	56-033-0002-1	PM <sub>10</sub>	168 µg/m <sup>3</sup>	1
4/18/2007	2007	General Chemical	56-037-0014-1	PM <sub>10</sub>	195 µg/m <sup>3</sup>	1
6/29/2007	2007	Eagle Butte	56-005-0906-2	PM <sub>10</sub>	168 µg/m <sup>3</sup>	1
8/13/2007 – 8/16/2007	2007	Sheridan PD  Sheridan Highland Park	56-033-0002-1  56-033-0003-1	PM <sub>2.5</sub>  PM <sub>2.5</sub>	34.8 µg/m <sup>3</sup> 27.4 µg/m <sup>3</sup> 30.5 µg/m <sup>3</sup> 26.2 µg/m <sup>3</sup>	2
4/19/2008	2008	Murphy Ridge Sta.	56-041-0101-1	PM <sub>10</sub>	157 µg/m <sup>3</sup>	1
8/1/2008	2008	Cody	56-029-0001-1	PM <sub>2.5</sub>	42.3 µg/m <sup>3</sup>	4
1/1/2009	2009	Black Butte	56-037-0868-2 56-037-1868-1	PM <sub>10</sub>	158 µg/m <sup>3</sup> 279 µg/m <sup>3</sup>	1
5/12/2009	2009	Black Butte, I-80 Teom	56-037-1868-1	PM <sub>10</sub>	176 µg/m <sup>3</sup>	1
2/27/2009 – 3/13/2009	2009	South Pass, Fremont Co.	56-013-0099-1	O <sub>3</sub>	78 ppb 77 ppb 79 ppb 89 ppb 93 ppb 83 ppb 80 ppb	1
5/30/2011	2011	South Pass	56-013-0099-1	O <sub>3</sub>	81 ppb	3
11/12/2011	2011	N Antelope Rochelle, RO-1	56-005-0869	PM <sub>10</sub>	157 µg/m <sup>3</sup>	1
1/11/2012	2012	Naughton	56-023-0820-2	PM <sub>10</sub>	312 µg/m <sup>3</sup>	3
1/12/2012	2012	Naughton	56-023-0820-2	PM <sub>10</sub>	167 µg/m <sup>3</sup>	3
1/13/2012	2012	Naughton	56-023-0820-2	PM <sub>10</sub>	325 µg/m <sup>3</sup>	3
1/16/2012	2012	Naughton	56-023-0820-2	PM <sub>10</sub>	179 µg/m <sup>3</sup>	3
1/18/2012	2012	Naughton	56-023-0820-2	PM <sub>10</sub>	174 µg/m <sup>3</sup>	3
		Mountain Cement	56-001-0800-3	PM <sub>10</sub>	170 µg/m <sup>3</sup>	3
1/21/2012	2012	School Creek - 3	56-005-0086-1	PM <sub>10</sub>	226 µg/m <sup>3</sup>	3
		School Creek - 2	56-005-0087-1	PM <sub>10</sub>	223 µg/m <sup>3</sup>	3
		N Antelope/ Rochelle RO-1	56-005-0869-2	PM <sub>10</sub>	200 µg/m <sup>3</sup>	3
3/26/2012	2012	Mountain Cement	56-001-0800-3	PM <sub>10</sub>	204 µg/m <sup>3</sup>	3
4/12/2012	2012	Buckskin Mine N	56-005-1899-1	PM <sub>10</sub>	180 µg/m <sup>3</sup>	3
6/5/2012	2012	Wyodak	56-005-0901-1	PM <sub>10</sub>	237 µg/m <sup>3</sup>	3
		Bridger Coal JB-4	56-037-0860-1	PM <sub>10</sub>	215 µg/m <sup>3</sup>	3
6/6/2012	2012	Thunder Basin	56-005-0123-1	O <sub>3</sub>	88 ppb	3

EE Date	Year	Location	Monitor ID	Parameter	Monitored Value	Ref.
6/26/2012	2012	Pinedale	56-035-0101-1	PM <sub>2.5</sub>	47.0 µg/m <sup>3</sup>	3
6/28/2012	2012	Big Piney	56-035-0700-1	PM <sub>2.5</sub>	53.8 µg/m <sup>3</sup>	3
6/29/2012	2012	Lander	56-013-1003-1	PM <sub>2.5</sub>	41.8 µg/m <sup>3</sup>	3
		Casper	56-025-0001-1	PM <sub>2.5</sub>	36.5 µg/m <sup>3</sup>	3
		Big Piney	56-035-0700-1	PM <sub>2.5</sub>	110.6 µg/m <sup>3</sup>	3
6/30/2012	2012	Big Piney	56-035-0700-1	PM <sub>10</sub>	190 µg/m <sup>3</sup>	3
		Big Piney	56-035-0700-1	PM <sub>2.5</sub>	143.7 µg/m <sup>3</sup>	3
7/1/2012	2012	Big Piney	56-035-0700-1	PM <sub>2.5</sub>	85.4 µg/m <sup>3</sup>	3
7/2/2012	2012	Big Piney	56-035-0700-1	PM <sub>2.5</sub>	97.4 µg/m <sup>3</sup>	3
7/3/2012	2012	Big Piney	56-035-0700-1	PM <sub>2.5</sub>	74.7 µg/m <sup>3</sup>	3
7/4/2012	2012	Gillette Col.	56-005-0800-1	PM <sub>2.5</sub>	56.5 µg/m <sup>3</sup>	3
		Belle Ayr BA-4	56-005-0892-1	PM <sub>2.5</sub>	55.3 µg/m <sup>3</sup>	3
		Antelope 3	56-009-0819-1	PM <sub>2.5</sub>	47.0 µg/m <sup>3</sup>	3
		Big Piney	56-035-0700-1	PM <sub>2.5</sub>	68.4 µg/m <sup>3</sup>	3
7/5/2012	2012	Big Piney	56-035-0700-1	PM <sub>2.5</sub>	38.6 µg/m <sup>3</sup>	3
9/18/2012	2012	Wyoming Range	56-035-0097-1	PM <sub>2.5</sub>	39.1 µg/m <sup>3</sup>	3
9/20/2012	2012	Wyoming Range	56-035-0097-1	PM <sub>2.5</sub>	52.3 µg/m <sup>3</sup>	3
		Pinedale	56-035-0101-1	PM <sub>2.5</sub>	44.8 µg/m <sup>3</sup>	3
9/21/2012	2012	Rock Springs	56-037-0007-1	PM <sub>2.5</sub>	37.6 µg/m <sup>3</sup>	3
		Town of Jackson	56-039-1006-1	PM <sub>2.5</sub>	39.2 µg/m <sup>3</sup>	3
12/2/2012	2012	Buckskin Mine N	56-005-1899-1	PM <sub>10</sub>	167 µg/m <sup>3</sup>	3
12/20/2012	2012	N Antelope/ Rochelle RO-1	56-005-0869-2	PM <sub>10</sub>	188 µg/m <sup>3</sup>	3
3/4/2013	2013	Black Thunder	56-005-0891-2	PM <sub>10</sub>	166 µg/m <sup>3</sup>	3
3/17/2013	2013	Black Butte #10	56-037-0868-2	PM <sub>10</sub>	261 µg/m <sup>3</sup>	3
		Black Butte I-80	56-037-1868-1	PM <sub>10</sub>	432 µg/m <sup>3</sup>	3
6/13/2013	2013	Kemmerer Mine	56-023-0800-1	PM <sub>10</sub>	273 µg/m <sup>3</sup>	3
1/13/2014	2014	Black Butte #10	56-037-0868-2	PM <sub>10</sub>	166 µg/m <sup>3</sup>	3
2/21/2014	2014	Black Butte Lucite Hills	56-037-0852-1	PM <sub>10</sub>	204 µg/m <sup>3</sup>	3
3/17/2014	2014	Black Butte #10	56-037-0868-2	PM <sub>10</sub>	202 µg/m <sup>3</sup>	3
		Black Butte Lucite Hills	56-037-0852-1	PM <sub>10</sub>	242 µg/m <sup>3</sup>	3
4/28/2014	2014	Black Butte Lucite Hills	56-037-0852-1	PM <sub>10</sub>	219 µg/m <sup>3</sup>	3
7/14/2014	2014	Black Butte Lucite Hills	56-037-0852-1	PM <sub>10</sub>	294 µg/m <sup>3</sup>	3
3/28/2015	2015	Antelope 6	56-009-0851-1	PM <sub>10</sub>	174 µg/m <sup>3</sup>	5
		N Antelope/ Rochelle RO-1	56-005-0869-2	PM <sub>10</sub>	190 µg/m <sup>3</sup>	5
		N Antelope/ Rochelle NA-8	56-009-0088-1	PM <sub>10</sub>	276 µg/m <sup>3</sup>	5

EE Date	Year	Location	Monitor ID	Parameter	Monitored Value	Ref.
11/18/2015	2015	Rawhide RA-23	56-005-0826-1	PM <sub>10</sub>	253 µg/m <sup>3</sup>	6
		Wyodak 5	56-005-5555-1	PM <sub>10</sub>	186 µg/m <sup>3</sup>	6
		Wyodak 6	56-005-6666-1	PM <sub>10</sub>	350 µg/m <sup>3</sup>	6
		N Antelope/ Rochelle NA-8	56-009-0088-1	PM <sub>10</sub>	266 µg/m <sup>3</sup>	7

- 1 U.S. Environmental Protection Agency Region 8 May 2015 letter regarding Wyoming Department of Environmental Quality Exceptional Events Documentation Packages; 2007-2011.
- 2 Wyoming Department of Environmental Quality Exceptional Events Documentation Package submitted June 2008 to U.S. Environmental Protection Agency Region 8
- 3 U.S. Environmental Protection Agency Region 8 April 2016 letter regarding Wyoming Department of Environmental Quality Exceptional Events Documentation Packages; 2011-2014. Wyoming Department of Environmental Quality May 2016 letter regarding Wyoming Department of Environmental Quality Exceptional Events Documentation Packages; 2011-2014.
- 4 Wyoming Department of Environmental Quality Exceptional Events Documentation Package submitted June 2009 to U.S. Environmental Protection Agency Region 8
- 5 Wyoming Department of Environmental Quality Exceptional Events Documentation Packages submitted September 2015 to U.S. Environmental Protection Agency Region 8.
- 6 Wyoming Department of Environmental Quality Exceptional Events Documentation Packages submitted May 2016 to U.S. Environmental Protection Agency Region 8.
- 7 Wyoming Department of Environmental Quality Exceptional Events Documentation Package submitted June 2016 to U.S. Environmental Protection Agency Region 8